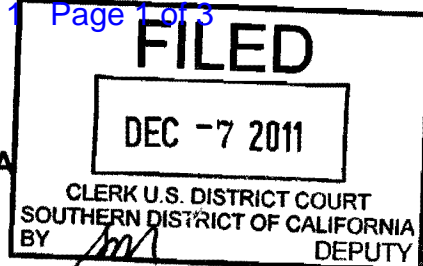


DEF
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12-7-11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA



UNITED STATES OF AMERICA)

Case No. **'11 MJ4567**

VS)

COMPLAINT FOR VIOLATION OF

21 U.S.C. Sections 952 & 960,

Importation of a Controlled Substance

Connie Guadalupe VILLATORO)

The undersigned complainant being duly sworn states:

COUNT 1

That on or about December 06, 2011, within the Southern District of California, Connie Guadalupe VILLATORO did knowingly and intentionally import approximately 28.55 kilograms (62.81 pounds) of Methamphetamine, a Schedule II Controlled Substance, into the United States from a place outside thereof; in violation of Title 21, United States Code, Sections 952 and 960.

And the complainant states that this complaint is based on the attached statement of facts, which is incorporated herein by reference.

Michael Brown, Special Agent
U.S. Immigration and
Customs Enforcement (ICE)

Sworn to before me and subscribed in my presence, this 7th day of December 2011.

United States Magistrate-Judge

12-6-11
DA /m

PROBABLE CAUSE STATEMENT

I, Special Agent Michael Brown, declare under penalty of perjury, the following is true and correct.

On December 06, 2011, at approximately 1630 hours, Connie Guadalupe VILLATORO, who was driving a Dodge Charger bearing California/US license plate number 5WYA008, applied for entry into the United States from Mexico at the Otay Mesa Port of Entry (POE) in San Diego, CA.

On December 06, 2011, at approximately 1630 hours, U.S. Customs & Border Protection Officer (CBPO) Mario Albano, who was assigned to vehicle primary lane 04 at the Otay Mesa POE, stated that he received two negative customs declaration from Connie Guadalupe VILLATORO, the driver and sole occupant of the Dodge Charger bearing CA/US license plates 5WYA008. CBPO Albano stated that he referred the vehicle to secondary inspection due to a computer generated referral.

On December 06, 2011, at approximately 1645 hours, Canine Enforcement Officer (CEO) Steven Jansen, who was assigned to the Otay Mesa POE, utilized his narcotics detector dog to screen the Dodge Charger while in the vehicle secondary lot. CEO Jansen stated that his assigned narcotics detector dog alerted to a narcotic odor emanating from the Dodge Charger bearing CA/US license plates 5WYA008.

On December 06, 2011, at approximately 1650 hours, CBPO Vance Cockrell, while working at the Otay Mesa POE, was assigned the inspection of the Dodge Charger bearing CA/US license plates 5WYA008. CBPO Cockrell

discovered cellophane wrapped packages of a crystal-like substance concealed within hidden compartments located on the driver and passenger side floors of the Dodge Charger. A field-test on the contents of a randomly selected package resulted in a positive reaction for methamphetamine. A total of 25 packages of methamphetamine with an approximate weight of 28.55 kilograms/62.81 pounds were seized.

On December 06, 2011, at approximately 1911 hours, Connie Guadalupe VILLATORO was advised of her rights, as per Miranda, in the English language by U.S. Immigration and Customs Enforcement (ICE) Special Agent (SA) Michael Brown. ICE SA Patrick MacKenzie witnessed the advisement and subsequent waiver of rights by VILLATORO. Post-Miranda, VILLATORO admitted knowledge of the methamphetamine in the vehicle. VILLATORO was advised of her arrest for violation of 21 USC Sections 952 & 960.